

27 December 2005

Alaska Department of Transportation and Public Facilities
Division of Statewide Planning
3132 Channel Drive, Room 200
Juneau, AK. 99801-7898

143

Re: Public Comments on the Draft 2006-2008 Statewide Transportation Improvement Program (STIP).

Submitted by email, hard copy to follow

To DOT Planning,

Thank you for the opportunity to comment on the Draft 2006-08 Statewide Transportation Improvement Program (STIP). The National Parks Conservation Association (NPCA) is America's only private, nonprofit advocacy organization dedicated solely to protecting, preserving and enhancing the National Park System. NPCA was founded in 1919 and today has 300,000 members of which 1,000 are in Alaska.

NPCA supports appropriate access to Alaska's national parks and, as such, has a long history in advocating for transportation improvements through the STIP. Though we are pleased that some projects have been included for funding, we are deeply concerned about the status of several key projects found in Needs List, but are not listed in the STIP. Please accept these comments as you contemplate the allocation of federal highway funds and determine the level of priority for projects listed in the 2006- 2008 STIP and beyond.

Wrangell St. Elias National Park (WRST) Park Related Projects:

We are pleased to see that the STIP lists a safety improvement project for the McCarthy Road, but are concerned about the assigned priority and anticipated construction schedule. But more importantly, we are concerned about several key McCarthy road upgrade and roadside amenity projects that are missing from the STIP altogether.

McCarthy Road Upgrade

While the McCarthy Road Upgrade EIS process continues to move forward, there are no projects included in the STIP for implementing this sorely needed upgrade or any of the needed roadside amenities. Out of eight possible projects listed in the Needs List only one can be found in the STIP and that is for emergency repairs. As soon as the Road Upgrade EIS is completed, there must be funds available for implementation. The two

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specific projects from the Needs List we would like included in the 2006 to 2008 STIP are:

1. McCarthy Road: MP 0-17 (ID#12079 - \$30.4 million) – add to the STIP

We realize that upgrading the road is a phased project. We believe there is enough research, stakeholder input, and funding available to make this project a reality. This improvement project from Chitina to the Kuskulana Bridge and including the Kuskulana Wayside, should be moved from the Needs list to the STIP and ranked as a high priority for funding for as soon as the EIS process is completed. The Draft Environmental Impact Statement (EIS) for the McCarthy Road Upgrade is scheduled for release in April 2006. Comments should be analyzed with a final EIS and Record Of Decision in 2007, so funding for construction can start in the STIP for 2008.

This section of road passes through extensive wetlands and is marked by outstanding panoramic views of rolling hills and mountains to the east and west, which could be safely observed and interpreted at the Kuskulana Wayside. In addition the wayside will help draw attention to the notable historic Kuskulana Bridge, an outstanding example of an original railroad trestle still in use today. A large part of experiencing Wrangell-St. Elias National Park, McCarthy, and the Kennicott Historical District is defined by the historical, cultural and scenic beauty that is present along the McCarthy Road. It is essential that there is funding allocated in the 2006-2008 STIP to begin the construction process as soon as the environmental assessment is finished. We recommend that this project be moved from the Needs List to the STIP and receive a high priority for full funding to begin construction in 2008.

2. Kennicott/ River Wayside project (ID #6859 - \$775,000) – add to the STIP

This project was originally scheduled for construction in 2004 under Amendment #13 to the 2001-2003 STIP (dated August 29, 2002). This project should be moved from the Needs List and placed in the STIP as high priority, as it will provide a desperately needed loading area, short-term parking and sanitary facilities at the end of the McCarthy road. Most important, it will provide interpretation that welcomes people to and explains Wrangell-St. Elias National Park, McCarthy, and the Kennicott Historical District. The National Park Service has agreed to manage the facility to ensure that all is maintained and kept in good working condition. The project will create a gateway to the park at the footbridge that welcomes visitors and provides needed facilities to ensure continued and increased access to the area's exceptional historic, natural and recreational resources. We believe that this is one of the most important projects for the park and the local communities of the Copper Valley. This project is designed and ready to go. We recommend that the project be moved from the Needs List to the STIP and allocated full funding to begin construction in 2006.

McCarthy Road Safety Improvements

Earlier this year congress earmarked \$4.25 million for McCarthy Road safety repairs with the passage of SAFETEA-LU – The Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users. In addition, Governor Frank Murkowski included \$2 million in the proposed 2007 Alaska capitol budget for major maintenance on the McCarthy Road from state funds that are outside the purview of the STIP. The expenditure of those state funds should be coordinated with the earmarked federal dollars to ensure an economy of scale that secures maximum road improvement for dollars expended.

The McCarthy Road is the only road access for residents and visitors to the McCarthy - Kennecott area and serves as a vital link to Chitina and the rest of the state road system. As it is the only road access to Wrangell - St. Elias National Park on the park's west side, it is essential to the economic prosperity of Copper Valley residents. While we strongly support a more comprehensive upgrade of the McCarthy Road, needed safety improvements can begin almost immediately. The STIP should reflect this safety need and the \$4.25 million earmarked funding level must be reflected in the STIP so these improvements can be made as soon as the funds are approved by the Alaska Legislature and the Capitol Budget is signed by the Governor. As such, we suggest that the \$3 million **McCarthy Road: Safety Improvements (ID# 7381)** be moved from the Needs List and included in the STIP for 2006 in an increased amount to reflect how those earmarked federal dollars will be invested.

In addition, NPCA supports the inclusion of **McCarthy Road: Slide/Flood Damage Repairs (ID#15681)** in the STIP at \$625,000 slated for funding, design and construction in 2009. However, with the state currently spending \$2 million on road repairs in the 2006 capitol budget and with \$6.25 million proposed in the 2007 capitol budget (\$4.25 federal earmark, \$2 million state general funds) there needs to be an explanation of how this project fits with these other projects. We would suggest that an economy of scale could be met by having this project occur at the same time as other state funded projects so less funding is spent on mobilizing a contractor and more is invested in fixing the road. The STIP should reflect this timing and synergy between projects.

Nabesna Road

- **Rehabilitation (ID#3766 - \$5.5 million) – add to STIP**
- **Tok Cutoff/ Nabesna Road Interpretive Waysides (ID#3620 - \$600,000) – add to STIP**
- **Twin Lakes/ Jack Creek Waysides (ID#6578 - \$450,000) – add to STIP**

While the primary access to Wrangell - St. Elias National Park (WRST) is the McCarthy Road, the Nabesna Road is becoming increasingly popular with visitors and important for local businesses. Tourism is a very important part of the economy in and around Wrangell - St. Elias and a key to supporting those tourism interests is improving the

Nabesna Road. As such, NPCA supports improvements to the Nabesna Road as part of its larger program of supporting appropriate access to Alaska's national parks. These projects will improve the road and create needed amenities to increase access for residents and visitors to America's largest national park. We are pleased to see that projects are listed for the Nabesna Road in the Needs List, however we believe these projects need to be integrated into the 2006-2008 STIP and elevated in priority for funding.

Denali National Park Related Projects:

- **Denali Park Entrance Trail (ID# 9908 - \$960,000) – add to STIP**
- **Nenana Canyon to McKinley Village Bike Trail (ID# 9904 - \$1.75 million) – add to STIP**
- **MP 244- Denali Gateway North (ID# 6605 - \$250,000) – add to STIP**

These projects will improve access to Denali National Park while creating alternative transportation routes and activities for visitors and local residents. In addition they will enhance the overall visitor experience by providing additional interpretive exhibits and increasing access to local shops and businesses. We recommend that these projects be elevated in priority and integrated with full funding into the 2006-2008 STIP.

Glacier Bay National Park Related Projects:

Marine Highway Terminal: Gustavus Dock (ID# 16416) – strongly support

We are pleased to see this project listed in the STIP with its earmarked funding starting in 2006. There will need to be additional funds, however, to make this project complete and we'd like to see the timing and allocation of those funds reflected in the Final STIP. With the two controversial bridge projects no longer earmarked, there should be additional funds freed up within the DOT budget for projects Alaskan communities really need, such as this dock. This project will provide local residents with regular barge service and the space needed to accommodate Marine Highway vessels. It will also provide increased access for Charter boats and visitors to Gustavus and Glacier Bay National Park. This is a positive project for both local residents and visitors to the region.

Kenai Fjords National Park Related Projects:

Exit Glacier Road Pathway (ID#2629 - \$2.5 million) – add to STIP

This project will provide much needed alternative access from the Seward Highway to the National Park Service Recreation Area at Exit Glacier. The project will help increase visitor access and amenities by providing 2 additional trailhead/parking areas with ADA

accessible restrooms. We recommend that this project be listed as high priority and added to the 2006-2008 STIP for full funding.

We are pleased that the ADOT&PF is soliciting public comments on Draft 2006-08 and appreciate this opportunity to comment.

Sincerely,

Jeremiah Millen
Alaska Field Representative

cc: Jed Davis, Wrangell-St. Elias Superintendent
Paul Anderson, Denali Superintendent
Tommie Lee, Glacier Bay Superintendent
Jeff Mow, Kenai Fjords Superintendent
Marcia Blaszak, Regional Director